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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

SUSAN RYMER; RUBY KENDRICK; and
NICOLE MCMILLEN,

Plaintiffs,

v.

CLARK COUNTY, a political subdivision of
the State of Nevada; LAS VEGAS
METROPOLITAN POLICE DEPARTMENT,
as successor in interest to LAS VEGAS
TOWNSHIP CONSTABLE'S OFFICE, a
political subdivision of the State of Nevada;
SHERIFF JOE LOMBARDO, in his official
capacity as Ex Officio Constable, as successor
in interest to JOHN BONAVENTURA, former
Las Vegas Township Constable, in his official
capacity; JOHN BONAVENTURA, former
Las Vegas Township Constable, personally;
DEPUTY CONSTABLE BRYAN CORNELL,
personally and in his official capacity; and
DEPUTY DOES 1-100, personally and in their
official capacities,

Defendants.

CASE NO. 2:14-cv-00780-APG-NJK

**STIPULATION TO EXTEND THE
DEADLINE FOR PLAINTIFFS TO
FILE THEIR RESPONSE TO
DEFENDANTS' MOTION TO
DISMISS OR, IN THE
ALTERNATIVE, MOTION FOR
MORE DEFINITE STATEMENT [Dkt
122] AND TO EXTEND THE
DEADLINE FOR MOVING
DEFENDANTS TO FILE THEIR
REPLY**

(First Request)

IT IS HEREBY STIPULATED AND AGREED, by and between Jeffrey F. Barr of
the law firm of ASHCRAFT & BARR | LLP, counsel for Plaintiffs Susan Rymer, Ruby

1 Kendrick, and Nicole McMillen (hereinafter “Plaintiffs) and District Attorney Steven B.
2 Wolfson and Deputy District Attorney, Robert J. Gower, counsel for Defendants Clark
3 County, the Las Vegas Metropolitan Police Department, as successor in interest to Las
4 Vegas Township Constable’s Office, and Sheriff Joe Lombardo in his official capacity as Ex
5 Officio Constable, as successor in interest to John Bonaventura, former Las Vegas
6 Township Constable, in his official capacity, that the deadline for Plaintiffs to file their
7 Response to Defendants’ Motion to Dismiss or, in the Alternative, Motion for More Definite
8 Statement [Dkt 122] be extended to Friday, May 29, 2015.
9

10 IT IS FURTHER STIPULATED AND AGREED that the deadline for moving
11 Defendants to file their Reply be extended to Friday, June 12, 2015.

12 This Stipulation is entered into for the following reasons:

13 1. Counsel for Plaintiffs need additional time to respond to the Defendants’ Motion
14 to Dismiss [Dkt 122] that was filed on April 21, 2015. The Court entered a Minute Order
15 [Dkt 123] the evening of April 21, 2015 setting the deadline for Plaintiffs to file their
16 response to the motion fourteen (14) days from the date of the Minute Order and the
17 deadline to file the reply seven (7) days after the filing of the opposition.
18

19 2. Upon agreement by and between the Plaintiffs and these Defendants as set forth
20 herein, the parties respectfully request this Court grant the requested extension of time.

21 3. Denial of this request for an extension of the response and reply deadlines will not
22 allow counsel adequate time to respond and reply to this motion to dismiss and the
23 additional time requested herein is not sought for purposes of delay.
24

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4. This is the first request to extend the deadline for Plaintiffs to file their Response to the Defendants' motion to dismiss and for moving Defendants to file their Reply.

RESPECTFULLY SUBMITTED this 30th day of April, 2015.

Dated: April 30, 2015

ASHCRAFT & BARR | LLP

/s/ Jeffrey F. Barr

JEFFREY F. BARR, ESQ.

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Attorneys for Plaintiffs

Dated: April 30, 2015

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DISTRICT ATTORNEY

/s/ Robert J. Gower

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Attorneys for Clark County,
Las Vegas Metropolitan Police
Department, and Sheriff Joe Lombardo

ORDER

IT IS SO ORDERED that Plaintiffs' Response to Defendants' Motion to Dismiss or, in the Alternative, Motion for More Definite Statement [Dkt 122] is due on May 29, 2015 and the moving Defendants' Reply is due on June 12, 2015.

DATED this 30th day of April, 2015.



ANDREW P. GORDON
UNITED STATES DISTRICT JUDGE